

REMARKS

Claims 1-11 are all the claims pending in the application. By this Amendment, Applicant adds claims 12-16, which are clearly supported throughout the specification.

I. Preliminary Matters

The Examiner has acknowledged Applicant's claim to foreign priority and indicated receipt of the certified copy of the Priority Document. The Examiner has returned the initialed form PTO/SB/08 submitted with the Information Disclosure Statement filed on August 2, 2006. The Examiner has indicated acceptance of the drawing figures filed on February 26, 2004.

II. Summary of the Office Action

Claims 1-11 are all the claims pending in the application. Claims 1-11 presently stand rejected under 35 U.S.C. § 103(a).

III. Prior Art Rejections

Claims 1-11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2002/0161915 A1 to Crow et al. (hereinafter "Crow"), in view of U.S. Patent Publication No. 2003/0069973 A1 to Ganesan et al. (hereinafter "Ganesan"). Applicant respectfully traverses these grounds of rejection at least in view of the following exemplary comments.

The Examiner contends that Crow in view of Ganesan suggests each feature of independent claim 1. These grounds of rejection are not supportable for at least the following reasons. Claim 1 recites *inter alia* "if the received packet is the first fragment packet, ...comparing the result of the looked-up fragment ID with each list of a fragment look-up table into which the results of fragment looked-ups for other received packets are entered, to

determine if there is a corresponding list; searching an index indicating one of the protocol processors and corresponding to the tunnel ID of the received packet from a tunnel ID look-up table, and if the list corresponding to the result of the looked-up fragment ID exists in the fragment look-up table, entering the index into the corresponding list of the fragment look-up table.” The Examiner alleges that operations 110 and 114 of Crow, as depicted in Fig. 4, disclose the comparing and the searching, respectively (*see* pages 3 and 4 of the Office Action). Applicant respectfully disagrees.

Crow only discloses storing non-primary entries in the fragment memory. Crow does not disclose or suggest creating an entry in the fragment context (alleged lookup table) for the non-primary fragments. Crow discloses that the fragment context is generated only when the primary packet is received. Then, it is the fragment memory that is searched for any related fragments (Fig. 4 and ¶¶ 37 to 43). In other words, Crow does not disclose or suggest that when the first fragment is received, searching for a list of the fragmented packets in the look up table to determine if other (non-primary) packets were received. In Crow, the entire memory that stores the actual fragments is searched (operation 116), thus wasting additional resources.

Also, Crow discloses generating fragment context when the primary fragment is received. In other words, in Crow, the fragment context (*i.e.*, entry into the translation table 82) is generated only when the primary fragment is received. If the fragment context is entered into memory only for the primary fragment, there is no need to search for the fragment context (as one would clearly not exist when the primary fragment is received). In other words, it is clear that Crow does not disclose or suggest searching the translation table for an entry (fragment context) when the first/primary fragment is received.

In addition, Crow does not disclose or even remotely suggest entering an index when the list exists. On the contrary, Crow discloses generating fragment context (alleged “list”) and using it for translation. Crow does not disclose or suggest changing entries in an existing fragment context (alleged list).

Ganesan is only cited for its disclosure of tunneling ID and as such does not cure the above-identified deficiencies of Crow.

Therefore, “if the received packet is the first fragment packet, ...comparing the result of the looked-up fragment ID with each list of a fragment look-up table into which the results of fragment looked-ups for other received packets are entered, to determine if there is a corresponding list; searching an index indicating one of the protocol processors and corresponding to the tunnel ID of the received packet from a tunnel ID look-up table, and if the list corresponding to the result of the looked-up fragment ID exists in the fragment look-up table, entering the index into the corresponding list of the fragment look-up table,” as set forth in claim 1 is not disclosed by the combined disclosure of Crow and Ganesan. Together, the combined teachings of these references would not have and could not have rendered obvious the unique features of claim 1. For at least these exemplary reasons, claim 1 is patentable over Crow in view of Ganesan. Claims 2-6 are patentable at least by virtue of their dependency on claim 1.

Next, independent claim 7 recite features similar to, although not necessarily coextensive with, the features argued above with respect to claim 1. Therefore, arguments presented with respect to claim 1 apply with equal force here. For at least substantially analogous exemplary reasons, therefore, independent claim 7 is patentable over Crow and Ganesan. Claims 8-11 are patentable at least by virtue of their dependency on claim 7.

IV. New Claims

In order to provide more varied protection, Applicant adds claims 12-16, which are patentable at least by virtue of their dependency on claim 1 and for additional features set forth therein.

V. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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